

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 08 CV 3160
)	
EGAN MARINE, INC., in personam, MOTOR)	Judge Coar
VESSEL LISA E, in rem, and TANK BARGE)	
EMC-423, in rem,)	Magistrate Judge Cox
)	
Defendants.)	

EMERGENCY MOTION FOR LEAVE TO FILE APPEARANCE

NOW COMES Swanson, Martin & Bell, LLP, and requests leave of court to file an appearance on behalf of Defendants, EGAN MARINE CORPORATION (incorrectly sued as EGAN MARINE, INC., in personam), in personam, MOTOR VESSEL LISA E, in rem, and TANK BARGE EMC-423, in rem, (hereinafter collectively referred to as “EMC Defendants”), and in support thereof, states as follows:

1. Corporate Counsel for Egan Marine Corporation filed an appearance in this matter on June 30, 2008.
2. On July 22 2008, Egan Marine Corporation retained Swanson, Martin and Bell, LLP to serve as additional counsel in this matter.
3. This motion is captioned as an emergency, due to the pendency of another emergency motion Defendants intend to bring before the court on July 24, 2008.

WHEREFORE, for the foregoing reasons, Swanson, Martin & Bell, LLP moves this Court for leave to file an additional appearance on behalf of all defendants.

Respectfully submitted,

By: s /John P. Arranz
One of the Attorneys for Defendants

Dated: July 23, 2008

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